

THE
COMMPLIANCE
GROUP

February 24, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Re: **Pipeline Telecom, Inc.**
CPNI Certification Pursuant to 47 C.F.R. Â§ 64.2009(e)
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Pipeline Telecom, Inc. ("Pipeline Telecom"), enclosed herewith please find the company's Annual Customer Proprietary Network Information Certification ("CPNI Officer Certification") covering 2011.

Should you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,



Christopher A. Canter
On behalf of Pipeline Telecom, Inc.

Pipeline Telecom, Inc.

Statement of CPNI Procedures and Compliance

Pipeline Telecom, Inc. ("Pipeline Telecom") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, Pipeline Telecom does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. Pipeline Telecom does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to other carriers. Pipeline Telecom typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service.

Pipeline Telecom may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because Pipeline Telecom provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, the call detail information obtained by Pipeline Telecom is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

Pipeline Telecom safeguards from improper use or disclosure by employees the call detail information that Pipeline Telecom obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, Pipeline Telecom has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to Pipeline Telecom computers and call detail records. In the event of unauthorized CPNI access, Pipeline Telecom will notify the requisite law enforcement agencies, and the customer when possible.

Pipeline Telecom did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because Pipeline Telecom does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through Pipeline Telecom, it cannot notify those end-user customers directly if a breach occurs. However, Pipeline Telecom has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than information that has been publicly reported, regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

Pipeline Telecom, Inc.

**Annual CPNI Certification
47 C.F.R. § 64.2009(e)
EB Docket No. 06-36**

COMPANY NAME: Pipeline Telecom, Inc.
REPORTING PERIOD: January 1, 2011 - December 31, 2011
FILER ID: 826653
OFFICER: Lance Littlejohn
TITLE: President

I, Lance Littlejohn, hereby certify that I am an officer of Pipeline Telecom, Inc. ("Pipeline Telecom") and that I am authorized to make this certification on behalf of Pipeline Telecom. I have personal knowledge that Pipeline Telecom has established operating procedures that are adequate to ensure compliance with the Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Pipeline Telecom or to any of the information obtained by Pipeline Telecom. See 47 C.P.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Pipeline Telecom employs to ensure that it complies with the requirements set forth in § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Pipeline Telecom or to the information obtained by Pipeline Telecom.

Signed: 

On behalf of Pipeline Telecom, Inc.

Date: 21-February-2012